

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff(s),

V.

FXCM INC., DROR NIV and ROBERT  
LANDE,

Defendants.

No.: 1:17-cv-00916

**DECLARATION OF JEREMY A. LIEBERMAN IN SUPPORT OF MOTION OF THE GLOBAL BROKERAGE INVESTOR GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF COUNSEL**

YING ZHAO, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff(s),

V.

FXCM INC., DROR NIV and ROBERT N.  
LANDE,

Defendants.

No.: 1:17-cv-00955

DAVID BLINN, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff(s),

V.

FXCM INC., DROR NIV and ROBERT N.  
LANDE,

Defendants.

No.: 1:17-cv-01028

I, Jeremy A. Lieberman, hereby declare as follows:

1. I am an attorney with the law firm of Pomerantz LLP (“Pomerantz”), counsel on behalf of Wendy Howell, Gene Segalis, John Dearborn, and Timothy Black (the “Global Brokerage Investor Group”), and have personal knowledge of the facts set forth herein. I make this Declaration in support of the motion by the Global Brokerage Investor Group for consolidation of the above-captioned related actions, appointment as Lead Plaintiff for the Class, and approval of the Global Brokerage Investor Group’s selection of Pomerantz as Lead Counsel for the Class.

2. Attached hereto as the exhibits indicated are true and correct copies of the following:

- Exhibit A: Press release published over *Business Wire* on February 7, 2017, announcing the pendency of the first of the above-captioned actions to be filed;
- Exhibit B: Shareholder Certifications executed by the members of the Global Brokerage Investor Group;
- Exhibit C: Loss Chart of the Global Brokerage Investor Group; and
- Exhibit D: Firm resume of Pomerantz.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on April 10, 2017, at New York, New York.

/s/ Jeremy A. Lieberman  
Jeremy A. Lieberman